

UNITED STATES DISTRICT COURT
THE DISTRICT OF MASSACHUSETTS

PAULA O'DONNELL

Plaintiff

v.

DONNA BOGGS, MARIAN DOUCETTE,
BRENDAN HALL, WILLIAM FRANCIS,
MARY LOU MEGAN and THE BOSTON
GLOBE EMPLOYEES CREDIT UNION

Defendants

United States District Court

Civil Action No. 05-11257-NG

DEFENDANTS' INITIAL DISCLOSURES

In accordance with Fed. R. Civ. P. 26(a) and Local Rule 26.2, the defendants Donna Boggs, Marion Doucette, William Francis, Mary Lou Meighan and the Boston Globe Employees Credit Union submit their initial disclosures:

A. Individuals or entities likely to have discoverable information regarding the allegations stated in the complaint, furnished pursuant to Rule 26(a)(1)(A):

- 1) Paula O'Donnell.
- 2) Brendan Hall; 187 East Woodcrest Drive, Melrose, Massachusetts.
- 3) Marion Doucette; 62 Cumberland Drive, Brockton, Massachusetts.
- 4) William Francis; 36 Ninth Street, Stoughton, Massachusetts.
- 5) Mary Lou Meighan; 167 Belmont Street, Quincy, Massachusetts.
- 6) Donna Boggs; c/o Schultz & Boggs, 616 Main Street, Woburn, Massachusetts.
- 7) Office and Professional Employees International Union, Local 6, AFL-CIO ("Local 6"), 1 Billings Road, Suite 200, Quincy, MA 02171.

The defendant reserves the right to supplement and/or amend this list as necessary.

B. The following is a list of relevant documents, by category, furnished pursuant to Rule 26(a)(1)(B):

- 1) Personnel file of plaintiff;
- 2) Written communications between plaintiff and the Credit Union Board of Directors.
- 3) Collective Bargaining Agreement between the Boston Globe Employees Credit Union and Office and Professional Employees International Union, Local 6, AFL-CIO.
- 4) Written communications between plaintiff and Local 6.

The defendant reserves the right to supplement and/or amend this list as necessary.

C. Damages

Defendants are not seeking damages.

D. Insurance agreements

Defendants will produce copies of all relevant insurance agreements.

BOSTON GLOBE EMPLOYEES CREDIT
UNION,

By its attorneys,

/s/ Harvey Weiner

Harvey Weiner, BBO#519840
Robert J. O'Keefe, BBO#655653
PEABODY & ARNOLD LLP
30 Rows Wharf
Boston, MA 02110
(617) 951-2100

July 18, 2006

CERTIFICATE OF SERVICE FOR ELECTRONIC FILING

I hereby certify that a true and correct copy of Defendants' Initial Disclosures, dated July 18, 2006, has been served electronically on each of the parties listed on the Notice of Electronic Filing.

/s/ Harvey Weiner

Harvey Weiner

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